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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue  
the Development of Rates and  
Infrastructure for Vehicle Electrification.

Rulemaking 18-12-006  
(Filed December 13, 2018)

**REPLY COMMENTS OF ELECTRIFY AMERICA, LLC  
ON ASSIGNED COMMISSIONER'S RULING  
AND STAFF PROPOSAL**

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May 16, 2022

Electrify America appreciates the opportunity to provide a reply to the comments that have been submitted in response to the Assigned Commissioner's Ruling (“ACR”) and Staff Proposal which revises the draft Transportation Electrification Framework (“Draft TEF”). In reviewing the comments filed, it remains clear that the path towards Transportation Electrification (“TE”) will require significant investment whether spurred by rate design required by AB 841, rebates, or third-party contributions. How that investment is managed is well debated in the comments as varying viewpoints suggest the best path forward.

Below, Electrify America addresses:

1. Concerns with energization timetables for Electric Vehicle Service Equipment (“EVSE”);
2. The need to ensure that fast Direct Current Fast Charging (“DCFC”) equipment remains part of the solution for TE; and
3. The fundamental need to ensure that rates provide affordable charging for EV drivers.

**I. The Timetable to Achieve TE Requires Focus on Timetables for EVSE Energization**

Stepping back from the discussions focused on budgets and funding cycles, it remains important to consider practical fundamentals of the evolution towards an electrified transportation sector and key metrics and concepts that will allow the State of California to achieve its goals. In this regard, Electrify America draws attention to comments filed by EVgo and Tesla and the expressed concerns regarding the timetable

for the energization of EVSE. Indeed, both highlighted the concern with the pace with which EVSE is energized.<sup>1</sup>

Considering the concern with the pace with which facilities are energized becomes a matter of crisis if the Energy Division takes into account the goals for EVSE installations over the next seven plus years. Advanced Energy Economy (“AEE”) highlighted “the California Energy Commission’s (“CEC”) AB 2127 report, which estimates nearly 1.2 million public and multi-unit dwelling EV chargers will be needed to support 8 million light-duty EVs under EO N-79-20 by 2030 and an additional 157,000 chargers will be required to support 180,000 medium- and heavy-duty (MDHD) EVs by 2030. According to the CEC’s EV charger dashboard, the state currently has approximately 79,000 chargers in total; even with planned investments from investor-owned utilities (IOUs) and other sources, the state faces a material gap in the infrastructure needed to achieve its goals.”<sup>2</sup>

Electrify America disagrees with the AB 2127 report because it did not sufficiently account for ultra-fast 150-350 kW light duty charging stations as a TE solution and did not perform analysis of relative cost benefits among TE charging solutions. Furthermore, the report only recommended that DCFC EVSE comprise only 4% of the charging stations built with an overreliance on slower public L2 EVSE which

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<sup>1</sup> EVgo Services, LLC Opening Comments on the Assigned Commissioner’s Ruling and Energy Division Staff Proposal at 5-6; Tesla Inc. Opening Comments on Assigned Commissioner’s Ruling Adding Staff Proposal to the Record and Inviting Party Comments at 2-3.

<sup>2</sup> Opening Comments of Advanced Energy Economy on the Assigned Commissioner’s Ruling Adding Staff Proposal to the Record and Inviting Party Comment at 3. Note that the CEC report highlights that the 157,000 chargers needed to support 180,000 MDHD EVs are DC fast chargers.

requires a longer dwell time.<sup>3</sup> Nonetheless, notwithstanding the deficiencies of the AB 2127 Report, today there is a deficit of over one million chargers if the goals of 2030 are to be met.

In the recent comments filed following the workshop on energization timetables, Electrify America highlighted the ongoing plight of trying to install EVSE in California. Notably, Electrify America explained that at the end of 2021, the new service utility interconnection process for Electrify America stations averaged 38 weeks, or nearly nine months, in California. California's utilities have not completed construction, inspection, and energization of the new utility service until, on average, 31 weeks, or approximately seven months, after Electrify America completed construction of its charging stations. It is uncommon for other new retail establishments, such as grocery stores, shopping centers, and fast casual restaurants, to wait more than half a year to receive electrical service upon completion of site construction.

If we extrapolate those timetables and apply them to the goals for EVSE installation in California, under the most conservative calculations the State of California needs the equivalent of 25,500 *years of dedicated effort* to meet the objective of installing just the DC Fast Chargers that are recommended as part of the 1.2 million

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<sup>3</sup> In contrast, the Atlas Policy Study provides an analysis that does not minimize the role of DCFC. *See* <https://atlaspolicy.com/u-s-passenger-vehicle-electrification-infrastructure-assessment/>. The Atlas Policy Study provides an analysis that examines deployed technology and the cost/benefits of deploying ultra-fast DCFC versus slower charging EVSE. In particular the Atlas Policy Study demonstrates that ultra-fast chargers have substantially greater throughput, and can serve more customers than slower charging technology. Ultra-fast 350 kW charging serves the needs of more ZEVs per dollar invested, when compared to other technology options.

additional chargers needed in the State of California by 2030.<sup>4</sup> Put another way, if there is a goal to install roughly 133,000 chargers each year for the next seven and a half years, does the support within the IOUs align sufficiently to meet this goal? Given the extrapolated time commitment and the current pace of support for installation, the answer is clearly no. In this regard, the Revised Draft TEF misses the mark by not focusing on one of the most pressing questions for promotion of TE: how does the California Public Utilities Commission (“CPUC”) encourage the IOUs to expedite the work to energize EVSE? While perhaps not squarely addressed in Chapters 3 and 4 of the Revised Draft TEF, the Energy Division and the CPUC should nevertheless examine how TE can be expedited by focusing on:

- New Service Requests;
- Easements and Third-Party Permitting; and
- New Service Construction, Inspection, and Energization.

Nonetheless, Southern California Edison (“SCE”) shifts the responsibility for the delay in installing EVSE to the customer. In SCE’s opening comments, the IOU explains that

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<sup>4</sup> Calculation estimates that 13.5 percent of the nation’s DCFC EVSE is needed in California. *See* page 8 of the Atlas Policy Study accessed at <https://atlaspolicy.com/u-s-passenger-vehicle-electrification-infrastructure-assessment/>. The 13.5 figure is derived from the calculation that 13.5% of registered automobiles are in the State of California. *See* <https://www.fhwa.dot.gov/policyinformation/statistics/2020/mv1.cfm>.

“Because EV charging infrastructure typically requires the design and development of both utility-side and BTM infrastructure to support the EV charging, there is a critical need for customers to engage with the IOUs early and often in the process – to help the utility plan for their request, minimize the potential for re-work and ensure capacity will be available by the requested timeframe.... For example, customers may spend time and resources developing designs for their BTM infrastructure, only to find that they did not appropriately consider the *utility-side requirement to use the shortest or most practical, available and acceptable route to reach a service delivery point*. By engaging early with the utility, the customer will better understand the utility requirements for the site and the IOU can appropriately plan to support the customer’s needs.”<sup>5</sup>

Here, SCE cites the language of Rule 29 as highlighted above. The problem here is that SCE has not followed the directives of E-5167 which required Pacific Gas & Electric (“PG&E”), SCE and San Diego Gas & Electric (“SDG&E”) to adopt the following: “EV Service Extension shall extend along the shortest or most practical and available route as necessary to reach a Service Delivery Point *identified via mutual agreement* between PG&E and the Applicant.”<sup>6</sup>

SCE’s focus on the “utility-side requirement” is understandable in light of the fact that SCE has not adopted the tariff language as instructed in Resolution E-5167 that would require customer engagement in the first place.<sup>7</sup> While the

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<sup>5</sup> Southern California Edison Company’s (U 338-E) Opening Comments to Commissioner’s Ruling Adding Staff Proposal to the Record and Inviting Party Comments at 11-13. (Emphasis added); *see also* SCE Rule 29. (Rule 29 B. 14 Limitation: The length and normal route of the Electrical Distribution Infrastructure and EV Service Extension *will be determined by SCE according to its planning, designing, and engineering standards and considered as the distance along the shortest or most practical, available and acceptable route*.)

<sup>6</sup> Resolution E-5167 at 22 (emphasis added).

<sup>7</sup> Notably, SCE explains in footnote 25 that “SCE has found that it is essential that the utility and customer engage in planning discussions as soon as the customer begins contemplating electrification

CPUC should address the failure to comply with E-5167 in the first instance, the larger concern regarding timetables for energization remains. Indeed, there is a need for accountability for tariff compliance, a need for accountability on meeting timetables for EVSE installations, and a fundamental need to address how goals for charger installation will be met if the current pace continues.

In this regard, Electrify America encourages the Energy Division and the CPUC to look farther than ensuring compliance with E-5167. The accountability warrants further precision in terms of expectations to accelerate the timetable for energizing EVSE. Here, Electrify America notes the Assigned Commissioner's Ruling which provided for comments on the Revised Draft TEF explained that energization of EVSE would follow the expectation "that the average timeline between a customer submitting a service request to when the EV charger is energized be between 90 and 160 days."<sup>8</sup> Furthermore, the Assigned Commissioner's Ruling explains that the deadlines will be enforceable. While budget levels, funding cycles and rebate structures will help guide the overall effort to promote TE, Electrify America contends that the progress to achieve TE will be measured best by the actual chargers installed by the timelines set forth by the Legislature and the Governor and the number of EVs on the road.

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efforts, rather than waiting until customer-owned equipment or vehicles are purchased. This helps the customer avoid the negative experience of having to wait on the utility to complete any utility-side work to facilitate the transition."

<sup>8</sup> Assigned Commissioner's Ruling Adding Staff Proposal to the Record and Inviting Party Comments at 10 (February 25, 2022). *See also* Post Workshop Comments of Electrify America attached at Appendix A.

## **II. Public Facing Charging Remains an Essential Component to Supporting TE Goals**

The nature of the questions with particular focus on rebates and commitment levels to Disadvantaged Communities (“DACs”) elicited comments on priorities for rebates and TE overall goals. Many commenters observed the need to prioritize charging options for MUDs and income segments within those MUDs. Here, Public Advocate highlighted that a barrier to EV adoption in low-income and minority communities is access to at-home charging. In a survey of nearly 3,000 California EV drivers, 48% of survey respondents in apartments reported charging from home, while in contrast, 82% of respondents in single-family homes reported charging from home.<sup>9</sup>

Further, Public Advocate explained that “a 2017 survey of nearly 3,000 EV drivers conducted by University of California, Davis and the International Council on Clean Transportation illustrates the lack of available home charging in MUDs. Fewer than half (18 to 48 percent depending on vehicle type) of survey respondents in MUDs reported charging from home. In contrast, 84 to 94 percent of drivers in detached single-family homes, and 66 to 83 percent of drivers in attached single-family homes reported charging from home.”<sup>10</sup>

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<sup>9</sup> Comments of the Public Advocates Office at 15, *citing* International Council on Clean Transportation “Quantifying the EV Charging Infrastructure Gap Across US Markets”, p. 9. Accessed at [https://theicct.org/sites/default/files/publications/US\\_charging\\_Gap\\_20190124.pdf](https://theicct.org/sites/default/files/publications/US_charging_Gap_20190124.pdf).

<sup>10</sup> *Id.* at 21, *citing* Nicholas, Michael, Dale Hall, and Nic Lutsey. 2019. Quantifying the Electric Vehicle Charging Infrastructure Gap Across U.S. Markets, [https://theicct.org/sites/default/files/publications/US\\_charging\\_Gap\\_20190124.pdf](https://theicct.org/sites/default/files/publications/US_charging_Gap_20190124.pdf) (last accessed 3/8/2022).



The statistics cited by Public Advocate speak to a reality left unaddressed by the focus on the Revised Draft TEF; many residents do not have the luxury of leaving vehicles overnight in the driveway of a single-family home. While it makes sense to focus on DACs and promote charging options at MUDs, public facing charging still remains an important and integral part of the TE future. This is a point Electrify America has repeatedly made for the Energy Division and CPUC to consider. In comments from a recent December workshop on funding allocation for future EV charging projects, Electrify America explained that

[A]ccording to CEC's AB 2127 and SB 1000 reports on the geographic and equitable distribution of EV infrastructure, DCFC charger deployment is more heavily centered on low- and moderate-income communities, which have 11 and 14 DCFC per 100,000 people respectively. High income communities have the lowest concentration of DCFC per capita, with only nine units per 100,000 residents. In stark contrast, high income communities have 25% higher levels of Level 2 charger deployment per capita than low-income communities. This study demonstrates that investing state funding in ultra-fast, reliable public charging stations, instead of Level 2 charging stations, is more likely to lead to investment in the lower-income and disadvantaged communities prioritized by the California legislature. (Internal citations omitted.)

These conclusions are further supported in research by Atlas Public Policy which concluded that widespread deployment of 350kW charging is the most cost-effective option for meeting the charging needed to transition the light duty fleet to 100% ZEV sales by 2035.<sup>11</sup> Further, as noted by ChargePoint, “[m]any lower and middle-income customers will rely on a combination of MUD charging, MUD-serving public charging,

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<sup>11</sup> See [https://atlaspolicy.com/wp-content/uploads/2021/04/2021-04-21\\_US\\_Electrification\\_Infrastructure\\_Assessment.pdf](https://atlaspolicy.com/wp-content/uploads/2021/04/2021-04-21_US_Electrification_Infrastructure_Assessment.pdf)

and workplace charging to meet their charging needs.”<sup>12</sup> This point is also made by the National Diversity Coalition in explaining that “[p]ublic charging designed to support nearby MUDs could meaningfully encourage MUD residents to adopt EVs. Such residents may find it convenient to charge at local retail areas while doing their normal shopping.”<sup>13</sup> In this regard, the policies of the Revised Draft TEF should identify and promote public facing charging as an important component of bringing TE to DACs.

In this context, Electrify America has a track record of commitment to DACs and low-income communities and a plan to support DACs and low-income communities in the future. As noted by the Greenlining Institute, “VW ZEV Investment Plan Cycle 1 and Cycle 2: For Cycle 1, Electrify America anticipates that 35% of their investment will be in low-income and disadvantaged communities across all its investment categories. For Cycle 2, Electrify America’s plan commits to exceed the 35% minimum investment in low-income and disadvantaged communities.”<sup>14</sup> This commitment does not waver in coming years as outlined in Electrify America’s California ZEV Investment Plan; Cycle 3.<sup>15</sup>

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<sup>12</sup> Chargepoint, Inc. Opening Comments on Energy Division Staff Proposal to Establish Transportation Electrification Funding Cycles and Statewide Behind-The-Meter Program at 13.

<sup>13</sup> Opening Comments of the National Diversity Coalition on the New Energy Division Staff Proposal to Establish Transportation Electrification Funding Cycles and Statewide Behind-The-Meter Program at 15.

<sup>14</sup> Opening Comments of The Greenlining Institute on Staff Proposal at 4. As explained at p. 6 in the 2021 Electrify America Annual Report, “Electrify America continued to invest heavily in disadvantaged and low-income communities during 2021, as well as rural California. As shown in Figure 3, nearly 50% of Electrify America’s public, ultra-fast charging stations at every stage of development are in disadvantaged and low-income communities, exceeding the 35% target.”

<sup>15</sup> See California ZEV Investment Plan: Cycle 3 at 5, available at [https://www.electrifyamerica.com/assets/pdf/cycle3\\_investment\\_plan.2338a9b6.pdf](https://www.electrifyamerica.com/assets/pdf/cycle3_investment_plan.2338a9b6.pdf) (“Consistent with guidance from CARB, Electrify America will strive to ensure that 35% of Cycle 3 investments are in low-income and disadvantaged communities.”)

The potential of ultra-fast DCFC as a charging solution should also be recognized as a vital component of the effort to reduce Greenhouse Gas Emissions (“GHGs”). This is a point highlighted by EDF Renewables:

“The majority of workplace charging occurs during the middle of the day when marginal greenhouse gas (GHG) emissions are lowest due to an abundance or, at times, an oversupply of solar energy. However, MUD charging typically occurs in the evening and night when drivers come home, aligning with evening peaks and more natural gas generation. Even if MUD sites are on time-of-use rates and postpone charging until after the evening peak, the marginal GHG emissions rate is generally higher at night than it is during the midday.”<sup>16</sup>

While EDF Renewables was promoting workplace charging, the benefit of public facing ultra-fast DCFC should also be seen as an important strategy to minimize GHGs in the transportation sector.

### **III. Affordability of Charging Should Continue to Guide the Adoption of a Revised Draft TEF**

With multiple commenters providing guidance on promoting TE within DACs, TURN provides the most succinct observation explaining that “[a]chieving equity starts with a real commitment to affordability.”<sup>17</sup> EVgo provides greater context to this imperative stating that it:

[S]trongly recommends that the Staff Proposal be updated to include a set of rate design recommendations akin to the EVREVs. EVgo believes it would be a mistake to focus solely on new funding programs without consideration of the critical role of rate design in EVSE deployment. The commercial EV rates put in place by the Investor-Owned Utilities (IOUs)

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<sup>16</sup> EDF Renewables, Inc. Comments on Staff Proposal at 4.

<sup>17</sup> Comments of The Utility Reform Network on the Energy Division Staff Proposal to Establish Transportation Electrification Funding Cycles and Statewide Behind-The-Meter Program At 6.

are time-limited, yet rate design remains important for the life of EVSE, especially for [DCFC]. For DCFC, electricity is by far the largest operating expense. Previously, it was thought that DCFC utilization would increase exponentially, rendering demand charges less consequential to the DCFC cost stack as EV adoption climbed. However, since the IOUs' first EV rate designs were contemplated, a distinct tradeoff between customer experience and utilization has been documented.<sup>18</sup>

This concern mirrors a concern raised by Electrify America in its opening comments.<sup>19</sup> If rate designs and in particular demand charge mechanisms do not reflect appropriate use cases or actual cost causation, efforts to promote TE on a Statewide basis and particularly within priority communities will suffer. As observed in Electrify America's California ZEV Investment Plan: Cycle 3, "[f]or utility areas with tariff structures that result in a delivered cost of energy for DCFC above the gasoline equivalent cost, Electrify America may be forced to shift investments to areas with more sustainable energy rates."<sup>20</sup> Here, the CPUC must recognize that utilities that serve DACs and "communities hit first and worst by both poverty and pollution" can either facilitate or frustrate TE within these communities with the rate structures adopted for EV charging.<sup>21</sup> While TURN distilled the essence of the potential of TE for individual drivers into the succinct observation that achieving equity requires affordability, the

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<sup>18</sup> EVgo Services, LLC Opening Comments on the Assigned Commissioner's Ruling and Energy Division Staff Proposal at 3.

<sup>19</sup> See Comments of Electrify America, LLC on Revised Draft TEF at 12. ("In this context, the CPUC should recognize that commercial rates for third-party charging operations provide one of the most compelling market signals for private investment. In Electrify America's experience on a nationwide basis, demand charges and the less transparent subscription charge based on maximum demand, deter market evolution more than any other regulatory tool available to a regulator.") Citing McFarlane, D., et al., "Overcoming Barriers to Expanding Fast Charging Infrastructure in the Midcontinent Region," Great Plains Institute, available at [https://www.betterenergy.org/wp-content/uploads/2019/08/GPI\\_DCFC-Analysis.pdf](https://www.betterenergy.org/wp-content/uploads/2019/08/GPI_DCFC-Analysis.pdf) (July 2019).

<sup>20</sup> California ZEV Investment Plan: Cycle 3 at 32.

<sup>21</sup> Citing Opening Comments of The Greenlining Institute on Staff Proposal at 4.

question of affordability for public charging stations will likely depend on rate structures and associated demand components of the rate. Notably, demand charges are the largest differentiating factor between effective electricity rates billed by the utility to residential accounts and to commercial accounts. This inequity imposes greater costs on Californians who depend on public charging stations, such as those who reside in MUDs.

The National Diversity Coalition frames the question of affordable rates in an appropriate context in the myriad of considerations for determining rebate levels, explaining that:

In setting appropriate rebate levels, the Commission, stakeholders, and administrators must consider the average per port costs for BTM EVSE deployment, the value of the benefits the customer will receive, *customer willingness and ability to pay*, the existence and amount of other subsidies, the need for financial support and air quality improvement at the customer's location, and fair additional incentives to counter historical inequity.<sup>22</sup>

Fundamentally, the National Diversity Coalition highlights that the level and structure of a rebate may not matter in the final analysis if a driver sees that the cost of charging services exceeds the cost to operate a fossil fuel vehicle. Indeed, the CPUC should ensure that the policies endorsed within the rubric of the TEF promote the innovation of rate design to meet the statutory mandate of SB 350 which requires that electricity as a fuel of the future that is equal to or less expensive than the equivalent of a fossil fuel.<sup>23</sup>

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<sup>22</sup> Opening Comments of the National Diversity Coalition on the New Energy Division Staff Proposal to Establish Transportation Electrification Funding Cycles and Statewide Behind-The-Meter Program at 10 (emphasis added).

<sup>23</sup> See 740.12. (a) (1) (H) Deploying electric vehicle charging infrastructure should facilitate increased sales of electric vehicles by making charging easily accessible and should provide the opportunity to

Policies should promote innovation in rate design that results in effective rates for electricity delivered to public charging stations that are comparable with those for residential charging so as to create equitable electric transportation incentives in DACs.

Electrify America appreciates the opportunity to provide reply comments and remains available to discuss these matters in greater detail with Energy Division staff as appropriate.

Dated this 16<sup>th</sup> day of May 2022.

Respectfully submitted,

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access electricity as a fuel that is cleaner and less costly than gasoline or other fossil fuels in public and private locations.



April 28, 2022

**VIA EMAIL**

Mr. Michael Truax  
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Energy Division, California Public Utilities Commission  
505 Van Ness Avenue,  
San Francisco, CA 94102

RE: Post Workshop Comments on Energization Timelines

Dear Mr. Truax:

Pursuant to your email communication of Monday, April 18, 2022 to the Service list of R.18-12-006, Electrify America is providing post workshop comments on energization timelines. We appreciate the opportunity to offer additional comments on an issue that has become one of the most crucial considerations in the efforts to accelerate the transition to Transportation Electrification ("TE") in the State of California. Below, we address concerns with:

- Delays in site energization;
- The costs associated with the delay in site energization;
- The abnormally extended delays in bringing DC fast charging electric vehicle service equipment online for the public;
- Concerns with siting battery storage to bolster capability of public facing DC fast charging; and
- Specific recommendations to expedite the interconnection process and site energization.

California remains a priority for Electrify America in the ongoing efforts to build a nationwide backbone of public facing fast charging facilities.<sup>1</sup> Indeed, Electrify America opened ultra-fast charging stations at a rapid pace during 2021 despite continuing to face longstanding challenges and issues related to station permitting and new utility service. These two areas were again Electrify America's primary cause for delay and undue station "soft costs" in California. Utility tracking of their site energization efforts against standard timelines from permitting to site energization can help ensure timeliness in station availability to the public.

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<sup>1</sup> The details of Electrify America's most recent investment plan for the State of California can be found at [https://www.electrifyamerica.com/assets/pdf/cycle3\\_investment\\_plan.2338a9b6.pdf](https://www.electrifyamerica.com/assets/pdf/cycle3_investment_plan.2338a9b6.pdf).



It costs 47% more, on average, to design and construct an Electrify America station in California than it costs to build a station with the same number of chargers in another state. This higher cost per station results in California receiving fewer stations per dollar invested by Electrify America, and these higher costs are primarily driven by permitting delays and utility site energization delays. With respect to permitting, the average time to complete the permitting process for DC fast charging station sites in California rose from 77 to 81 business days in 2021. Overall it takes 26% longer to complete the permitting process in California than the national average.

Electrify America's ultra-fast charging stations (150kW-350kW) cannot open to the public until the local utility provides "new service" by constructing a line extension and installing a transformer. The local electric utility typically has four essential responsibilities: (1) validating power availability, (2) designing the new utility service, (3) creating easements and securing permits for the new service line extension and equipment, and (4) scheduling construction crews to build the line-extension, inspect the station, and energize the site.

As of the end of 2021, the new service utility interconnection process for Electrify America stations averaged 38 weeks, or nearly nine months, in California. Critically, California's utilities have not completed construction, inspection, and energization of the new utility service until, on average, 31 weeks, or approximately seven months, after Electrify America completed construction of its charging stations. It is uncommon for other new retail establishments, such as grocery stores, shopping centers, and fast casual restaurants, to wait more than half a year to receive electrical service upon completion of site construction.

Our experience with deploying behind-the-meter battery energy storage systems at ultra-fast charging stations is also challenging. For example, some utilities considered the storage to be added load or generation notwithstanding restrictions effectively imposed by Rule 21. These battery systems are designed to reduce peak load and lower demands on the distribution system. Treating them as new load – in addition to the EV charging station load – serves as a barrier to rapid deployment efforts, and frequently leads to rigorous, time-intensive interconnection studies.

Electrify America has respectfully suggested the following steps to expedite the utility interconnection process:

- New Service Requests: California utilities are taking an average of seven weeks from the date of new service request to completion of the request, although the longest processes can take six months or longer. This process is expedited when the utility establishes a team dedicated to designing EV charging station service, as





these staff have the resources, experience, and knowledge necessary to develop new service requests in a timely manner.

- **Easements and Third-Party Permitting:** New service from the utility will often cross private land or rights-of-way, necessitating easements. Sometimes the line extension construction requires separate permits. Utilities that initiate these processes before the utility design plan (“UDP”) is finalized often complete these processes without delaying the project. However, when utilities initiate easements and permitting only after UDP finalization, these steps in the process are frequently a source of project delay. These processes could also be expedited if the State clarified in guidance that the permits required to connect a charging station to the grid are subject to the limitations and timelines established in AB 1236 and AB 970.
- **New Service Construction, Inspection, and Energization:** As of the end of 2021, Electrify America had completed site work and construction at 34 ultra-fast charging stations that were not yet open because they were awaiting utility energization, inspection, energization, and commissioning, a 21% increase from Q3 2021. With an average of 31 weeks elapsing between site construction completion and energization, there is opportunity to expedite the process. While the work necessary for construction and inspection typically represents one to two weeks of work, the longer average timeline is most commonly the result of limited crew availability, substantial scheduling delays, and frequent project rescheduling. Extenuating, project-specific circumstances (e.g., an easement or third-party permit remains pending) can also be the cause of delay.<sup>2</sup> More proactive efforts by utilities to secure permits could help alleviate these challenges. Additionally, utility inspections are occasionally inconsistent regarding what different inspectors look for to approve or disapprove when inspecting Electrify America sites, further extending timelines because inspector differences, which are unable to be anticipated, must be accommodated.<sup>3</sup>

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<sup>2</sup> In some cases where Electrify America was waiting for the utility to start their construction, we received news that they are suddenly required to apply for additional permits or that the original permit they had secured expired so they needed to resubmit, causing significant delays in energization timelines. In one instance, a utility required a Caltrans permit, received a Caltrans permit, and only subsequently realized a city permit was additionally required, delaying site energization by over five months from site construction completion.

<sup>3</sup> For example, one site has undergone extensive reconstruction due to inconsistent information from the utility between the preconstruction stage and the inspection stage, necessitating the relocation of



- Electrify America recommends that utilities establish standard timelines for new service construction projects and prioritize staffing to ensure that new service projects are completed on schedule in accordance with AB 841 and the Commission's record. As Commissioner Rechtschaffen noted in describing AB 841 obligations, "[T]he expectation being that the average timeline between a customer submitting a service request to when the EV charger is energized be between 90 and 160 days. After the workshop, the Commission will adopt an enforceable timeline for energization."<sup>4</sup>

On a fundamental level, revisions to tariffs need to provide transparency for the California Public Utilities Commission ("CPUC"), the California Air Resources Board ("CARB"), and other stakeholders desiring an accelerated pace towards an electrified transportation sector. We welcome engagement and discussion on any of the recommendations above to promote a collaborative process with the utility stakeholders who can lead with improvements to existing practices to meet many of the State's goals.

Sincerely,

*/s/ Matthew B. Nelson*  
Matthew B. Nelson  
Director of Government Affairs  
Electrify America

*/s/ Anthony Lambkin*  
Anthony Lambkin  
Senior Director of Operations  
Electrify America

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two bore pits and change outs of conduit sweeps and trench boxes, adding significant delays and costs to that site's energization.

<sup>4</sup> Assigned Commissioner's Ruling adding Staff Proposal to the record and inviting party comments, Rulemaking 18-12-006, at 10 (Issued February 25, 2022).